

ORIGINAL

ELLIOT ENOKI #1528
Acting United States Attorney
District of Hawaii

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUL 10 2017
at 1 o'clock and 42 min M.
SUE BEITIA, CLERK

LAWRENCE L. TONG #3040
Chief, Fraud and Financial Crime Section
KENNETH M. SORENSON
MARC A. WALLENSTEIN #10456
Assistant U.S. Attorneys
Room 6100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, Hawaii 96850
Telephone: 541-2850
Facsimile: 541-2958
E-mail: marc.wallenstein@usdoj.gov

TARYN M. MEEKS
Trial Attorney
Counterterrorism Section
National Security Division
U.S. Department of Justice
950 Pennsylvania Ave. NW
Washington, D.C. 20530
Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	MAG. NO. 17-00767 KJM
)	
Plaintiff,)	CRIMINAL COMPLAINT;
)	AFFIDAVIT IN SUPPORT
vs.)	
)	
IKAIKA ERIK KANG,)	
)	
Defendant.)	
)	

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

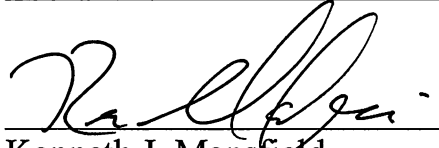
From at least in or about June 20, 2017 up to and including in or about July 8, 2017, in the District of Hawaii, and elsewhere, IKAIKA ERIK KANG, the Defendant, did knowingly attempt to provide “material support or resources,” as that term is defined in Title 18 United States Code, Section 2339A(b), including property (including classified and unclassified military documents and a drone) and training (including instruction on combat techniques) to a foreign terrorist organization, to wit, ISIS, which at all relevant times was designated by the Secretary of State as a foreign terrorist organization, knowing that ISIS was a designated foreign terrorist organization and that ISIS engages in and has engaged in terrorist activity and terrorism, all in violation of Title 18, United States Code, Section 2339B(a)(1).

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this Complaint is based upon the facts set forth in the attached affidavit which is incorporated herein by reference.



JIMMY CHEN
Complainant

Subscribed to and sworn before me on
7/10/17, at Honolulu, Hawaii



Kenneth J. Mansfield
UNITED STATES MAGISTRATE JUDGE

